

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**NOTICE OF DEFENDANTS' JOINT MOTION TO EXCLUDE THE
OPINIONS OF RON NAJAFI, PH.D.**

PLEASE TAKE NOTICE that on July 5, 2022, or as soon thereafter as counsel may be heard, the undersigned Defense Executive Committee counsel, on behalf of all Defendants named below, shall move for an entry of Order excluding the opinions of Plaintiffs' expert, Ron Najafi, Ph.D., pursuant to Federal Rules of Evidence 104, 702, and 703.

PLEASE TAKE FURTHER NOTICE that in support of their motion, the undersigned defendants shall rely upon the Memorandum of Law in Support submitted herewith, and any reply submissions made hereafter and the Certification of Clem C. Trischler, Esq. together with exhibits; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: May 3, 2022

Respectfully Submitted:

By: /s/ Clem. C. Trischler

Clem C. Trischler

Defendants' Executive Committee

PIETRAGALLO GORDON
ALFANO BOSICK & RASPANTI,
LLP

Clem C. Trischler

Jason M. Reefer

Frank H. Stoy

38th Floor, One Oxford Centre

Pittsburgh, Pennsylvania 15219

Tel: (412) 263-2000

Fax: (412) 263-2001

cct@pietragallo.com

jmr@pietragallo.com

fhs@pietragallo.com

*Counsel for Mylan Laboratories, Ltd.
and Mylan Pharmaceuticals, Inc.*

GREENBERG TRAURIG, LLP

Lori G. Cohen

Victoria Davis Lockard

Steven M. Harkins

Terminus 200

3333 Piedmont Road, N.E.,

Suite 2500

Atlanta, Georgia 30305

(678) 553-2100

(678) 553-2386 (facsimile)

CohenL@gtlaw.com

LockardV@gtlaw.com

HarkinsS@gtlaw.com

*Counsel for Teva Pharmaceuticals
USA, Inc., Teva Pharmaceutical*

*Industries Ltd., Actavis Pharma, Inc.,
and Actavis LLC*

SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
Jessica D. Miller (DC Bar No. 457021)
*Liaison Counsel for Manufacturer
Defendants*
Nina R. Rose (DC Bar No. 975927)
1440 New York Ave., N.W.
Washington, D.C. 20005
Tel.: (202) 371-7000
Fax: (202) 661-0525
jessica.miller@skadden.com
nina.rose@skadden.com

*Counsel for Zhejiang Huahai
Pharmaceutical Co, Ltd., Huahai U.S.,
Inc., Princeton Pharmaceutical Inc. and
Solco Healthcare US, LLC*

KIRKLAND & ELLIS LLP
Devora W. Allon
Alexia R. Brancato
601 Lexington Avenue
New York, New York 10022
Tel: (212) 446-5967
Fax: (212) 446-6460
Devora.allon@kirkland.com
Alexia.brancato@kirkland.com

*Attorneys for Torrent
Pharmaceuticals Ltd. and Torrent
Pharma Inc.*

MORGAN, LEWIS & BOCKIUS
LLP
John P. Lavelle, Jr.
1701 Market Street
Philadelphia, Pennsylvania 19103

Tel: (215) 963-5000
Fax: (215) 963-5001
John.lavelle@morganlewis.com

John K. Gisleson
One Oxford Centre, Thirty-second
Floor
Pittsburgh, Pennsylvania 15219
Tel: (412) 560-3300
Fax: (412) 560-7001
John.gisleson@morganlewis.com

*Attorneys for Aurobindo Pharma Ltd.,
Aurobindo Pharma USA, Inc., and
Aurolife Pharma LLC*

LEWIS BRISBOIS BISGAARD &
SMITH LLP
Walter H. Swayze, III
Andrew F. Albero
550 E. Swedesford Road, Suite 270
Wayne, Pennsylvania 19087
Tel: (215) 977-4100
Fax: (215) 977-4101
Pete.swayze@lewisbrisbois.com
Andrew.albero@lewisbrisbois.com

*Attorneys for Camber
Pharmaceuticals, Inc. and The
Kroger Co.*

HILL WALLACK LLP
Eric I. Abraham
William P. Murtha
21 Roszel Road
P.O. Box 5226
Princeton, New Jersey 08543-5226
Tel: (609) 734-6358
Fax: (609) 452-1888
eabraham@hillwallack.com

wmurtha@hillwallack.com

*Attorneys for Hetero Drugs, Ltd. and
Hetero Labs Ltd.*

HARDIN KUNDLA MCKEON &
POLETTO

Janet L. Poletto, Esq.
Robert E. Blanton, Jr., Esq.
673 Morris Ave.
Springfield, New Jersey 07081
Tel: (973) 912-5222
Fax: (973) 912-9212
jpoletto@hkmpp.com
rblanton@hkmpp.com

Attorneys for Hetero USA Inc.

BARNES & THORNBURG LLP
Sarah E. Johnston, *Liaison Counsel for
Retailer Defendants*

Kara Kapke
Kristen L. Richer
2029 Century Park East, Suite 300
Los Angeles, CA 90067
Tel: (310) 284-3798
Fax: (310) 284-3894
Sarah.Johnston@btlaw.com
Kara.Kapke@btlaw.com
Kristen.Richer@btlaw.com

Kara Kapke
11 S Meridian St.
Indianapolis, Indiana 46204
Tel: (317) 236-1313
Fax (317) 231-7433
kara.kapke@btlaw.com

*Counsel for CVS Pharmacy, Inc.
(incorrectly named as CVS Health*

*Corporation), Rite Aid Corporation,
Walgreen Co. (incorrectly named as
Walgreens Co.), and Walmart Inc.
(incorrectly named as Walmart Stores,
Inc.)*

HUSCH BLACKWELL LLP
Matt Knepper
James Spung
190 Carondelet Plaza
Suite 600
St. Louis, Missouri 63105
Tel: (314) 480-1500
Fax: (314) 480-1505
Matt.knepper@huschblackwell.com
James.spung@huschblackwell.com

Attorneys for Express Scripts, Inc.

DORSEY & WHITNEY LLP
Roxanna Gonzalez
51 West 52nd Street
New York, New York 10019
Tel: (212) 415-9357
Fax: (212) 953-7201
Gonzalez.roxanna@dorsey.com

*Attorneys for Optum, Inc. and Optum
Rx*

BUCHANAN INGERSOLL &
ROONEY PC
Jonathan D. Janow
Jason R. Parish
1700 K Street NW
Suite 300
Washington, DC 20006
Tel: (202) 452-7940
Fax: (202) 452-7989
Jonathan.janow@bipc.com

Jason.parish@bipc.com

Attorneys for Albertson's LLC

CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2022, a copy of the foregoing document was served on all counsel of record via CM/ECF.

By: /s/ Clem. C. Trischler
Clem C. Trischler